



Date: August 15, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Ave., SW., Room 4008
So. Ag Stop 0268
Washington, DC 20250

Via E-mail: National.List@usda.gov

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

Vitasoy USA, Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the continued inclusion of the following material(s):

Acids, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” These substances are used as a product characterizing agent in the preparation of organic dressings and marinates.

Vitasoy USA, Inc. currently uses acids to produce organic dressings and marinates. Due to the unique properties of acids, they are essential in our formulation to produce our organic dressings and marinates.

Kindest regards,

Fred F. Jewett, R&D Manager



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Vitasoy USA, Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the continued inclusion of the following material(s):

Calcium sulfate -mined, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” This substance has been used as a necessary and essential coagulant to create the characteristic fundamental texture and structure of organic tofu. There are a very limited number of coagulants available for the manufacture of tofu, each with specific properties. Calcium sulfate (also called ‘terra alba’ in tofu manufacture), has been a part of traditional tofu production for centuries.

Vitasoy USA, Inc. currently uses calcium sulfate, to produce organic tofu. Due to the crucial functional role that it plays, calcium sulfate is essential in formulation to produce our organic tofu.

Kindest regards,

Fred F. Jewett, R&D Manager



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Calcium phosphates, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” This substance (calcium phosphate tri-basic (TCP)) is used as a dietary source of calcium in the preparation of organic tofu, organic soymilk and other organic soy beverages.

Vitasoy USA, Inc. currently uses calcium phosphate to produce organic soymilk and soy beverages. Due to the unique chemical stability and bland flavor of calcium phosphate it is essential in our formulation to produce our organic tofu, soy milk and soy beverages.

Kindest regards,

Fred F. Jewett, R&D Manager



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Calcium carbonate, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” This substance is used as a dietary source of calcium in the preparation of organic tofu, organic soymilk and other organic soy beverages.

Vitasoy USA, Inc. currently uses calcium carbonate to produce organic soymilk and soy beverages. Due to the unique chemical stability and bland flavor of calcium carbonate it is essential in our formulation to produce our organic tofu, soy milk and soy beverages.

Kindest regards,

Fred F. Jewett, R&D Manager



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Glucono delta-lactone, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” This substance has been used as a necessary and essential coagulant to create the characteristic fundamental texture and structure of organic tofu. There are a very limited number of coagulants available for the manufacture of tofu, each with specific properties. Glucono-delta lactone (GDL), is unique in allowing for the production certain of tofu products.

Vitasoy USA, Inc. currently uses glucono-delta lactone to produce organic tofu. Due to the crucial functional role that it plays, GDL is essential in formulation to produce our organic tofu.

Kindest regards,

Fred F. Jewett, R&D Manager



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Enzymes, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” These substances are used as a product characterizing agent in the preparation of organic dressings, tofu, and marinates.

Vitasoy USA, Inc. currently uses enzymes to produce organic tofu, dressings, and marinates. Due to the unique properties of enzymes, they are essential in our formulation to produce our organic dressings, tofu, marinates.

Kindest regards,

Fred F. Jewett, R&D Manager



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Colors, nonsynthetic sources only, as found in National List Section § 205.605
Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic soybeans." This substance is used as a product characterizing agent in the preparation of organic dressings, organic soymilk and soy beverages.

Vitasoy USA, Inc. currently uses colors, nonsynthetic to produce dressings, organic soymilk and soy beverages. Due to the unique properties of nonsynthetic colors, they are essential in our formulation to produce our organic dressings, organic soy milk and soy beverages.

Kindest regards,

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Carrageenan, as found in National List Section § 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as “organic” or “made with organic soybeans.” This substance is used as a stabilizing agent in the preparation of organic marinates, soymilk and other organic soy beverages.

Vitasoy USA, Inc. currently uses carrageenan to produce organic marinates, soymilk and soy beverages. Due to the unique solubility and bland flavor of carrageenan it is essential in our formulation to produce our organic marinates, soy milk and soy beverages.

Kindest regards,

Fred F. Jewett, R&D Manager